

Exhibit L

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Case no. 1:23-CV-878

DEMOCRACY NORTH CAROLINA; NORTH)
CAROLINA BLACK ALLIANCE; LEAGUE)
OF WOMEN VOTERS OF NORTH)
CAROLINA,)

Plaintiffs,)

vs.)

ALAN HIRSCH, in his official)
capacity as CHAIR OF THE STATE)
BOARD OF ELECTIONS; JEFF CARMON)
III, in his official capacity)
as SECRETARY OF THE STATE BOARD)
OF ELECTIONS; STACY EGGERS IV,)
in his official capacity as)
MEMBER OF THE STATE BOARD OF)
ELECTIONS; KEVIN LEWIS, in his)
official capacity as MEMBER OF)
THE STATE BOARD OF ELECTIONS;)
SIOBHAN O'DUFFY MILLEN, in her)
official capacity as MEMBER OF)
THE STATE BOARD OF ELECTIONS;)
KAREN BRINSON BELL, in her)
official capacity as EXECUTIVE)
DIRECTOR OF THE STATE BOARD OF)
ELECTIONS; NORTH CAROLINA STATE)
BOARD OF ELECTIONS,)

Defendants.)

30(b) (6) DEPOSITION OF
NORTH CAROLINA BLACK ALLIANCE
By MARCUS BASS

HELD VIA ZOOM

9:33 A.M.

TUESDAY, MARCH 25, 2025

By: Denise Myers Byrd, CSR 8340, RPR

1 democracy. Thereby, most of our sessions, even
2 if it is based in healthcare or based in
3 economic justice, we have a huge portion of our
4 work that is crafted and ultimately utilizing
5 the political process and improving the
6 political process by means of improving in their
7 issue area, whatever specific issue area the
8 community works in. And so a huge percentage of
9 our work revolves around voting and voting
10 rights.

11 Q. Okay. What about NCBA's expenditures, what
12 percentage of its expenditures relate or are
13 used in voting rights?

14 A. I would say a little over 50 percent.

15 Q. So moving to the next issue in this list,
16 gerrymandering. What does this encompass for
17 NCBA?

18 A. It is education, education around what
19 gerrymandering is, what redistricting is, the
20 broader sense of redistricting, the historical
21 context for redistricting, and then also
22 alternatives to redistricting based on what
23 other practices from governing bodies across the
24 country have enacted, and an assessment of our
25 end product of redistricting and the impact of

1 voters.

2 In previous years, there have been
3 decreases in voter turnout across various parts
4 of the country and in North Carolina, and it is
5 also because of partisanship in the electoral
6 process a misunderstanding of the role in which
7 elections play and democracy for a greater part
8 plays in changing the lives and improving the
9 lives of young voters.

10 So our Youth Voter Engagement program
11 helps us to educate, train, and equip voters --
12 young voters with the material that they need to
13 be able to vote, resources and information that
14 they need to be able to vote, and also work to
15 improve the process in which barriers may be put
16 in place, intentionally or unintentionally, that
17 hinder turnout or voter engagement among young
18 people and first-time voters.

19 Q. What does NCBA do to be a connector or a
20 sustainer in this area?

21 A. Yes. So we have program that we run on
22 campuses, the campuses that I mentioned plus
23 additional campuses as requested. We have a
24 large digital platform in which we have a
25 website dedicated to youth voter engagement. Of

1 enough burden in our mind to believe that
2 college students in particular are singled out
3 specifically. Unlike any other resident that
4 may have a more secure way of receiving mail,
5 college students in some cases there is enough
6 variance to say this bill creates an undue
7 burden.

8 Q. How has NCBA been harmed by the same-day
9 registration provisions of 747?

10 A. My stomach's growling, I don't know if that
11 comes through on the mic.

12 Significantly, our work on the campus
13 before same-day registration changes was more so
14 around turnout, making sure that voters had the
15 documents necessary and making sure they were
16 able to go vote.

17 Now we have spent a considerable amount
18 of time and energy and staff capacity in
19 identifying the different ways in which campus
20 mail processes may encumber or send back a voter
21 card unknowingly to the demise of the student
22 that is actually trying to vote.

23 All of this effort around same-day
24 registration changes have made it more difficult
25 for us to actually do the robust voter turnout

1 and mobilization during the early voting cycle
2 with the assurance that the voters that
3 participate in those programs are able to vote.

4 Our staff has had to spend time talking
5 to postmasters of which are not voting rights
6 experts, nor should they be in the position to
7 validate or invalidate a student's status, and
8 in some cases the difficulty of finding these
9 individuals who are already overworked has been
10 challenging too.

11 Our Raising the B.A.R. fellows are
12 having to go talk to postmasters and ask them
13 about challenges and changes, having to actually
14 find voters that may or may not have received
15 their verification card in a timely manner as
16 well, too.

17 So we've some challenges in ways in
18 which we would not have had to spend this much
19 time on the process, on ensuring that the
20 process was provided in a way in which a voter
21 was able to actually see their vote count or see
22 their registration count.

23 In this case, we would not have spent
24 this much time working with students to inform
25 them of the change, working with the student

1 affairs professionals, getting contacts and
2 communication with the postmasters, identifying
3 with the postmasters those that have processes
4 by which they send back a mail verification
5 form, so there's a lot of ways in which this has
6 impacted our work.

7 Q. I believe you testified earlier, and please
8 correct me if I'm wrong, that NCBA updates its
9 materials and its efforts any time there's a
10 change in election law; isn't that right?

11 A. Yes. Yes. And that is not something that is
12 always a budgeted expense. When you think about
13 the fact that elections really should be the
14 same every single year and especially with a
15 policy that was not researched. In some cases,
16 a lot of these bills flying from other states,
17 we're hearing from other areas that these are
18 not necessarily bills that have to do with voter
19 integrity in North Carolina, but the changes
20 require us to go back and scrap dozens of print
21 material, invest in reprinting those materials.

22 And so it is not a function of our work
23 to have to change the nature in which we educate
24 voters, but it is incumbent upon us because of
25 the hostile nature in which policies are enacted

1 around election laws that we have to, as a part
2 of our mission, if we're going to give voters
3 accurate information, then we're having to go
4 back and reconfigure these pieces and add
5 different elements to our digital print and our
6 training materials as well, too, and the way in
7 which we training and educate voters whenever
8 these changes happen.

9 We would like to have a set standard by
10 which elections are administered that allows us
11 to create a process that doesn't confuse voters.
12 And if we didn't change our pieces of material
13 or aspects of the resourcing of that work or
14 pulling together those documents, then we would
15 be misinforming voters. So by nature of the
16 changes, we have to make those changes. It's
17 not something that we do by virtue of a want,
18 but in effect, if we send out inaccurate
19 information because policy shifted, that would
20 be negligent on us.

21 Q. So how does the change to same-day registration
22 in 747 impact NCBA's core mission?

23 A. We see policy changes, systemic change to be
24 connected to the process of voting. There are
25 voting policies, and those voting policies can

1 either improve the lives of constituents or it
2 can hinder -- further hinder lives of
3 constituents.

4 We see systemic issues and the voting
5 process as living in one spectrum, as in the
6 more individuals can participate in the
7 political process, the more they can create
8 systemic changes to policies.

9 Now, when you change the laws, in
10 particular when you make a change that encumbers
11 or hinders a college student from voting, of
12 which North Carolina has several hundred
13 thousand college students, these changes don't
14 just impact HBCU students. And I think it is
15 incumbent upon us in our mission to make sure
16 that while we are working through our programs
17 on our HBCU campuses that our work improving the
18 voting process has implications far greater than
19 just the 16 campuses that we're currently on.

20 Q. NCBA is still able to advocate in the community,
21 right?

22 A. I think the utilization of our democratic
23 process in creating systemic change is hindered
24 by the introduction of discriminate change to a
25 requirement for registration.